DMB:JPL/RMT F.#2012R01575

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

QUAZI MOHAMMAD REZWANUL AHSAN NAFIS,

Defendant.

Cr. No.
(T. 18, U.S.C., AMON, CH.)
(S, 2332a(a)(2), 2339B(a)(1), 2 and 3551, CH.)
et seq.)

THE GRAND JURY CHARGES:

COUNT ONE
(Attempt To Use A Weapon Of Mass Destruction)

In or about October 2012, within the Eastern District of New York and elsewhere, the defendant QUAZI MOHADER STEIN, M.J. AHSAN NAFIS did knowingly, intentionally and without lawful authority attempt to use a weapon of mass destruction, to wit: an explosive bomb and similar device, against persons and property within the United States, to wit: the Federal Reserve Bank of New York and persons in and near the Federal Reserve Bank of New York, and (1) one or more facilities of interstate and foreign commerce, to wit: mobile telephones and the internet, were used in furtherance of the offense, (2) such property was used in interstate and foreign commerce, and in an activity that affected interstate and foreign commerce, and (3) the offense and the results of the offense would have affected interstate and foreign commerce.

(Title 18, United States Code, Sections 2332a(a)(2), 2 and 3551 et seq.)

On or about and between July 15, 2012 and October 17, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant QUAZI MOHAMMAD REZWANUL AHSAN NAFIS did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including communications equipment, explosives and personnel, including himself, to a foreign terrorist organization, to wit: al-Qaeda.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

A TRUE BILL

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FOREPERSON

ORETTA E. LYNCH

UNITED STATES ATTORNEY

EASTERN DISTRICT OF NEW YORK

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UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL Division

THE UNITED STATES OF AMERICA

VS.

QUAZI MOHAMMAD REZWANUL AHSAN NAFIS,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2332a(a)(2), 2339B(a)(1), 2 and 3551 et seq.)

James P. Loonam and Richard M. Tucker, Assistant U.S. Attorneys (718-254-7000)